

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

First-Class Mail and Periodicals
Service Standard Changes, 2021

Docket No. N2021-1

STEVE HUTKINS
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO
UNITED STATES POSTAL SERVICE FOR WITNESS HAGENSTEIN

(May 17, 2020)

Pursuant to 39 C.F.R. § 3010.311, I hereby submit interrogatories and requests for production of documents to United States Postal Service witness Stephen B. Hagenstein.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

The instructions contained in my interrogatories to witness Hagenstein, SH/USPS-T-3-1-4, are incorporated herein by reference.

Respectfully submitted,

Dated: May 17, 2021

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SH/USPS-T-3-1. Please refer to Library Reference USPS-LR-N2021-1-3, Excel sheet entitled "3_Zip3_OD_Pairs.xlsx." Please confirm the following calculations. If not confirmed, please provide the correct percentages:

- a. For mail originating in the SCF 631 St. Louis, approximately 33 percent of the pairs would be downgraded from 3-day to 4-day, and 3.5 percent from 3-day to 5-day.
- b. For mail originating in SCF 981 Seattle, approximately 20 percent of the pairs would be downgraded to 4-day, and 72 percent to 5-day.
- c. For mail originating on the West Coast (with zip code prefix 9), approximately 66,898 pairs out of 75,937, or 88 percent of the pairs, will be downgraded to 4 or 5-day.
- d. For mail originating in the Northeast Central region (zip code prefix 4), approximately 28,069 pairs out of 87,689, or 32 percent of the pairs, will be downgraded to a 4 or 5-day standard.

SH/USPS-T-3-2: Please refer to USPS-LR-N2021-1-3, Excel sheet entitled "3_Zip3_OD_Pairs.xlsx," and USPS-LR-N2021-1-1, Excel spreadsheet "1_P.Mode_Mapping.xlsx." Please provide a spreadsheet that contains all of the data in the OD pair sheet plus the mode data from the second sheet, plus an additional column that shows the mode of transportation after the plan is implemented.

SH/USPS-T-3-3: Please provide an Excel sheet with rows showing each of the 3-digit prefixes and columns showing, for the corresponding 3-digit prefix, the following: (a) originating 3-digit prefix, (b) total number of pairs currently 2-day, (c) total number of pairs currently 3-day, (d) total number of 2-day pairs under proposal, (e) total number of 3-day pairs under proposal, (f) total number of 4-day pairs under proposal, (g) total number of 5-day pairs under proposal, (h) total volume for pairs currently 2-day, (i) total volume for pairs currently 3-day, (j) total volume for 3-day pairs under proposal, (k) total volume for 4-day pairs under proposal, (l) total volume for 5-day pairs under proposal.

SH/USPS-T-3-4. Please refer to Commission Report: Complaint on First-Class Mail Standards, Docket No. C2001-3, April 17, 2006, which dealt with the changes in service standards made in 2000-2001. Please refer to p. 2, section 1006, where the Commission stated the following:

Conclusions are also mixed because the record indicates that service under the adjusted standards appears to have improved for some postal patrons. However, many postal patrons in the western part of the Nation experienced a disproportionate number of service downgrades. Thus, the delivery service under the realignment resulted in a degree of unfairness and undue discrimination under section 403(c) for these patrons.

Please also refer to Commission Report, Appendix C, p. 12, section 38, where the Commission stated the following:

The Commission finds that the Complainant's assertions of undue discrimination, to the extent they involve delivery in California and other locales in the Pacific and Western areas, have merit. The Service's approach and application of the new model, given its underlying assumptions, resulted in a degree of unfairness that was clearly unintended, but nevertheless real. Geography, network design, and distances all play legitimate roles in determining service standards, but the Service's starting point — which, among other things, proceeded without public involvement and eliminated air transportation from initial determinations — exhibits an inappropriate degree of arbitrariness with respect to delivery in the areas Mr. Carlson highlights. The results, in turn, also impede the Service's ability to meet the mandate of section 101(a), which exhorts the Service "... to provide prompt, reliable, and efficient services to patrons in all areas...."

- a. Please discuss the similarities and differences between the 2000-2001 changes in standards and changes described in the current proposal, and please explain why the differences are such that the Commission would have no reason to find that the current proposal also results in "undue discrimination" under 403(c) and impedes the Postal Service's ability to meet the mandate of section 101(a).
- b. Has the Postal Service performed or commissioned any studies that would address issues involving geographic discrimination with the proposed changes?